

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

DENISHA M. SEALS,)	
PLAINTIFF)	CASE NO. 8:22-cv-420
)	
VS.)	MOTION AMEND
)	TO REMAND
BOARD OF REGENTS OF THE)	
UNIVERSITY OF NEBRASKA,)	
UNIVERSITY OF NEBRASKA OMAHA,)	
TRACY BRIDGEOFORD, PHD.,)	
JOANNE LI, PHD.,)	
MARGARETTE CHRISTENSEN, PHD.,)	
DEFENDANTS.)	

COMES NOW, Plaintiff, DENISHA M. SEALS, by and through her attorney, John D. Cartier, and asks this Court to grant this Motion to Amend Remand.

The Defendants, Board of Regents of the University of Nebraska, the University of Nebraska Omaha, Dr. Tracy Bridgeford, Dr. Joanne Lie, and Dr. Margarette Christensen was properly served a true and correct copy of the Summons and Complaint for this action in Douglas County District Court on November 10, 2022.

On December 7, 2022, Plaintiff was notified that the case was removed to United States District Court for the District of Nebraska.

On December 8, 2022, Plaintiff filed a Motion to Remand back to Douglas County District Court.

Plaintiff requests leave from the Court to amend its Motion to Remand and time to construct a legal memorandum that gives the basis for Remand. This time is needed by Plaintiff's attorney to become acquainted with Federal Civil Rules of Procedure and existing federal case law. Plaintiff's attorney has a background in state court; this will be Plaintiff attorney's first case in federal court. Plaintiff originally filed in state court and anticipated that is where the case would ultimately need to be tried based on issues of Sovereign Immunity of political subdivisions such as the Board of Regents of Nebraska and the University of Nebraska Omaha under the context of the Eleventh Amendment of the United States Constitution.

Opposing Counsel does not object to this Motion to Amend Remand.

Under Fed. R. Civ. P. 15(a)(2), a court “should freely give leave [to amend] when justice so requires.”

WHEREFORE, the Plaintiff requests this court approve the Motion to Amend Remand and allow Plaintiff adequate time at the Court’s discretion to amend the motion and issue a legal memorandum in support.

Dated December 12, 2022.

/s/ *John D. Cartier* /s/

John D. Cartier #26307

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CERTIFICATE OF SERVICE

I, John D. Cartier, hereby certify I electronically filed the forgoing on December 12, 2022, with the Clerk of the United States District Court for the District of Nebraska using the CM/ECF system, which sent an electronic copy to all registered case participants, including the following:

Tara A. Stingley

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/s/ *John D. Cartier* /s/